

From: Rochlin, Kevin
Sent: Friday, June 13, 2014 3:17 PM
To: Douglas.Tanner; Greutert, Ed [USA]; Kelly Wright; Scott Miller; Stifelman, Marc; susanh@ida.net; Zavala, Bernie
Cc: Williams, Jonathan; Rochlin, Kevin
Subject: Deadlines and fatal flaw design review

All,

Comments on the Remedial Design Package and the RA workplan are due Friday June 27. We will gather up and see where we are then.

I did a fatal flaw review of the package this morning. The one important issue is that I do not agree with the air trigger levels that are proposed in the plan. FMC sets their trigger levels at 1/10 of the OSHA standard. The air trigger levels are an indication that more control needs to be done as apposed to there being any risk. However, the OSHA standards are based on 8 hour exposure usually at the 10^{-4} risk level.

What I have used at other sites is a 5×10^{-5} residential level set over the length of the remedial action. Because this is a multiple year exposure level, used as a trigger level for action, it provides a huge margin of safety. It also may be too low to achieve, if so, these levels can be adjusted as they are not regulatory levels, but rather triggers. It is up to FMC do the calculations and see. If none of this made sense, give me a call and I will explain it or we discuss at one of our later meetings.

Kevin Rochlin